## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF VIRGINIA CHARLOTTESVILLE DIVISION

|   | - X |                             |
|---|-----|-----------------------------|
| BABY DOE, A CITIZEN OF AFGHANISTAN  | :   |                             |
| CURRENTLY RESIDING IN NORTH   | :   |                             |
| CAROLINA, BY AND THROUGH NEXT   | :   | CIVIL ACTION NO. 3:22-CV-49 |
| FRIENDS, JOHN AND JANE DOE; AND JOHN                                      | :   |                             |
| AND JANE DOE, CITIZENS OF AFGHANISTA                                      | N:  |                             |
| AND LEGAL GUARDIANS OF BABY DOE,  | :   |                             |
|   | :   |                             |
| Plaintiffs,   | :   |                             |
|   | :   |                             |
| V.  | :   |                             |
| IOCHUA MACT CTEDUANIE MACT DICHADI  | :   |                             |
| JOSHUA MAST, STEPHANIE MAST, RICHARI<br>MAST, KIMBERLEY MOTLEY, AND AHMAD | ):  |                             |
| OSMANI,   |     |                             |
| OSMANI,   | •   |                             |
| Defendants,   |     |                             |
| 2 cremanus,   | :   |                             |
| and   | :   |                             |
|   | :   |                             |
| UNITED STATES SECRETARY OF STATE  | :   |                             |
| ANTONY BLINKEN AND UNITED STATES  | :   |                             |
| SECRETARY OF DEFENSE GENERAL  | :   |                             |
| LLOYD AUSTIN,   | :   |                             |
|   | :   |                             |
| Nominal Defendants.   | :   |                             |
|   | 37  |                             |
|   | - X |                             |

## **NOTICE OF FILING UNDER SEAL**

Plaintiffs, by counsel, pursuant to Rule 9 of the Local Civil Rules, provides public notice that Plaintiffs have today moved to seal Exhibit 1 to Plaintiffs' Opposition to Defendants' Motions to Dismiss. All parties and non-parties are hereby notified that they may submit memoranda in support of or in opposition to the notice within seven (7) days, and that they may designate all or part of such memoranda as confidential.

Dated: November 28, 2022 Respectfully submitted,

/s/ Maya Eckstein

Maya M. Eckstein (VSB No. 41413) Lewis F. Powell III (VSB No. 18266) HUNTON ANDREWS KURTH LLP

951 E Byrd St

Richmond, VA 23219 Telephone: (804) 788-8200

Fax: (804) 788-8218

Email: <a href="mailto:meckstein@HuntonAK.com">meckstein@HuntonAK.com</a>
Email: <a href="mailto:lpowell@HuntonAK.com">lpowell@HuntonAK.com</a>

Sherli M. Furst (admitted pro hac vice)
Jeremy C. King (admitted pro hac vice)
HUNTON ANDREWS KURTH LLP
200 Park Avenue

New York, NY 10166 Telephone: (212) 309-1000

Fax: (212) 309-1100

Email: sfurst@HuntonAK.com Email: jking@HuntonAK.com

Sehla Ashai (admitted pro hac vice)

ELBIALLY LAW, PLLC

704 East 15th Street

Suite 204

Plano, TX 75074

Telephone: (312) 659-0154 Email: <u>ashai@elbiallylaw.com</u>

Blair Connelly (admitted pro hac vice) Zachary Rowen (admitted pro hac vice)

LATHAM & WATKINS LLP 1271 Avenue of the Americans New York, NY 10029

Telephone: (212) 906-1200 Email: <u>blair.connelly@lw.com</u> Email: <u>Zachary.rowen@lw.com</u> Damon Porter (admitted pro hac vice) Ehson Kashfipour (admitted pro hac vice) LATHAM & WATKINS LLP 555 Eleventh Street, NW, Suite 1000 Washington, DC 20004-1304 Telephone: (202) 637-2001

Email: damon.porter@lw.com Email: ehson.kashfipour@lw.com

Counsel for Plaintiffs

## **CERTIFICATE OF SERVICE**

I hereby certify that on the 28<sup>th</sup> day of November 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send a notification of such filing to all CM/ECF participants.

By: /s/ Maya M. Eckstein

Maya M. Eckstein (VSB # 41413) Hunton Andrews Kurth LLP Riverfront Plaza, East Tower 951 East Byrd Street Richmond, Virginia 23219-4074 Telephone: (804) 788-8200

Facsimile: (804) 788-8218 meckstein@HuntonAK.com

Counsel for Plaintiffs